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FILED
FEB 19 2019
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
CASE # SA19-mc-0111-FB

10 In Re:

11 Application of EDWARD D. FAGAN
12 pursuant to 28 U.S.C. § 1782 for Judicial Assistance in
13 obtaining evidence from J.P. MORGAN CHASE BANK
14 a/k/a CHASE BANK and CITIBANK N.A.,
15 and JOHNBULL EJOVI (J.P. Morgan Chase Bank
16 a/k/a Chase Bank Account Holder)
17 And CTS GLOBAL SUPPLY CHAIN SOLUTIONS
18 (Citibank Account Holder)
19 for use in a Foreign Tribunal and Proceeding
20

21
22 **SUPPLEMENTAL DECLARATION OF APPLICANT EDWARD D. FAGAN**
23 **IN SUPPORT OF APPLICATION FOR JUDICIAL ASSISTANCE**
24 **PURSUANT TO 28 U.S.C. § 1782 TO AID IN FOREIGN PROCEEDING**
25

26 EDWARD D. FAGAN (hereinafter "Applicant"), acting as a pro se Applicant,
27 hereby makes the following supplemental declaration in support of the pending application for
28 limited judicial assistance pursuant to 28 U.S.C. § 1782 and respectfully shows the Court the
29 following:

- 30 1. I make the statements in this Supplemental Declaration under penalty of perjury and
31 declare that they are true and correct.
32 2. I make the statements in this Supplemental Declaration under penalty of perjury and
33 declare that they are true and correct.
34 3. As a follow up to the statements in my February 6, 2019 Application, I wish to

In Re: Application of Edward Fagan against pursuant to 28 U.S.C. § 1782 for Judicial Assistance in obtaining evidence from (i) Witness Banks
J.P. Morgan Chase Bank a/k/a Chase Bank and Citibank NA and (ii) Witness Account Holders Johnbull Ejovi and CTS Global Supply Chain
Solution for use in a Foreign Tribunal and Proceeding

1 provide the Court with the following short update on the status of the currently
2 pending and ongoing criminal investigation(s) in the Republic of South Africa (SAPS
3 # 3471/1/2019)

- 4 4. I have just been informed that the investigation has now been re-assigned / taken up
5 by the South Africa Police Services "HAWKS - Directorate for Priority Crime
6 Investigation" (SAPS - DCPI). The Directorate for Priority Crime Investigation is
7 now responsible for the combating, investigation and prevention of national priority
8 crimes such as serious organized crime, serious commercial crime and serious
9 corruption in terms of Section 17B and 17D of the South African Police Service Act,
10 1995 as amended. See <https://www.saps.gov.za/dpci/index.php>
11 5. I have been requested to come to the SAPS-DCPI Head Office located at Anti-
12 Corruption Desk, A5 Promat Building, 1 Cresswell Road, Silverton, Pretoria to meet
13 with Inspector Capt. Chiloane who has been assigned to take over the case.
14 6. SAPS=DCP Capt. Chiloane has requested that I make another more detailed
15 statement so SAPS – DCPI so it can expand the investigation to include the South
16 African Ministry of Justice (<http://www.dirco.gov.za/contact.htm>) and South African
17 Bureau for Interpol (<http://www.dirco.gov.za/contact.htm>). I was told that SAPS –
18 DCPI intends to include investigators from the South African Ministry of Justice and
19 South African Interpol who will initiate further investigations and prosecutions into
20 this money laundering and wire fraud scheme that is being run in part out of South
21 Africa, which is international in scope and which has included things that occurred in

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this District.

7. I am traveling to South Africa in the next two weeks and I will provide the Court with a further update on the status of the investigation and information about what the South African investigators believe will help them and which can be secured from the applications for judicial relief pursuant to 28 USC 1782 from Witness Banks and the Witness Account holders to assist in the South African Police, Department of Justice and Bureau for Interpol's investigations and eventual prosecutions.
8. I continue to pray that the Court grant the application in its entirety.
9. I declare, certify, verify and state, pursuant to 28 U.S. Code § 1746, under penalty of perjury that the foregoing is true and correct.

Dated: February 14, 2019

/s/ Edward D. Fagan

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WESTERN DISTRICT OF TEXAS
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US District Courthouse
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